

Exhibit 3

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

COURTNEY LINDE, et al.

Plaintiff,

-against-

ARAB BANK, PLC,

Defendant.

Case No. CV 04 2799 (NG/VVP)

PHILIP LITTLE, et al.

Plaintiff,

-against-

ARAB BANK, PLC,

Defendant.

Case No. CV 04 5449 (NG/VVP)

ORAN ALMOG, et al.

Plaintiff,

-against-

ARAB BANK, PLC,

Defendant.

Case No. CV 04 5564 (NG/VVP)

ROBERT L. COULTER, SR.,
FOR THE ESTATE OF JANIS
RUTH COULTER, et al.

Plaintiff,

-against-

ARAB BANK, PLC,

Defendant.

Case No. CV 05 365 (NG/VVP)

JA1945

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GILA AFRIAT-KURTZER, et al.	:	
	:	Case No. CV 05 388 (NG/VVP)
Plaintiff,	:	
	:	
-against-	:	
	:	
ARAB BANK, PLC,	:	
	:	
Defendant.	:	

**RESPONSES AND OBJECTIONS OF DEFENDANT ARAB BANK PLC TO
PLAINTIFFS' JOINT MODIFIED PHASE I REQUEST FOR THE PRODUCTION OF
DOCUMENTS TO DEFENDANT ARAB BANK PLC**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Arab Bank plc ("Arab Bank"), a corporation organized under the laws of Jordan with its head office in Amman, Jordan, by its undersigned counsel, hereby submits the following responses and objections (the "Response") to Plaintiffs' Joint Modified Phase I Request For The Production of Documents To Defendant Arab Bank PLC (the "Requests").

GENERAL OBJECTIONS

1. Arab Bank objects to the Requests to the extent they seek to have Arab Bank disclose documents that are subject to bank secrecy laws of the countries in which Arab Bank operates. Any undertaking to produce responsive documents is subject to Arab Bank's obligations to comply with such laws or the parties' need to obtain waivers or exemptions from the prohibitions of such laws.

2. Arab Bank objects to the Requests to the extent that they seek the production of documents that do not specifically relate to Phase I of discovery, as specified by Magistrate Judge Pohorelsky at the Court conference on June 22, 2005.

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3. Arab Bank objects to each of the Requests as overbroad. Each Request seeks production, by way of example, of "complete transaction records," "all account records relating to wire transfers or other deposits from January 1, 2001 to [June 27, 2005]" and "all correspondence from the account holder or any other third party." Such requests impose an undue and unreasonable burden upon Arab Bank and seeks the disclosure of information that is not relevant to a claim or defense in this litigation.

4. Arab Bank objects to the Requests to the extent that they seek the production of documents or information protected by the bank examination privilege which applies to Arab Bank's dealings with its bank regulators. Arab Bank further objects to the Requests to the extent that they seek the production of documents or information protected by various other privileges, including but not limited to, the attorney-client privilege, the attorney work product doctrine, and any other legally recognized obligation and/or rule. Arab Bank hereby claims such privileges and objects to the production of any documents subject thereto. If any privileged document, or privileged information within a document, is inadvertently produced, Arab Bank does not waive or intend to waive any privilege pertaining to such document or information, or to any other documents or information.

5. Arab Bank reserves the right to correct, amend, modify or supplement its Response from time to time and at any time in the future, as warranted by the circumstances.

6. These General Objections shall be deemed continuing as to each Request, shall be incorporated in response to each Request whether or not specifically stated in response to each Request, and shall not be waived or in any way limited by the following responses.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

7. Plaintiffs purport to incorporate by reference the Definitions and Instructions set forth in Plaintiffs' First Request for Production of Documents to Arab Bank PLC,

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dated February 24, 2005. Arab Bank hereby incorporates its objections to those Definitions and Instructions, as set forth in its March 28, 2005 Responses and Objections of Defendant Arab Bank PLC to Plaintiffs' First Request for the Production of Documents to Defendant Arab Bank PLC.

RESPONSES AND OBJECTIONS TO SPECIFIC DOCUMENT REQUESTS

The following Responses and Objections to specific document requests are made in addition to, and without waiving, all of the foregoing General Objections and Objections to Definitions and Instructions (collectively, the "General Objections"), which are expressly incorporated into the responses and objections to specific document requests set forth below.

Plaintiffs' Request Number 1: Lebanese Bank Account

Account Number: 3-810-622473-0330

Branch: Al-Mazra Branch, Beirut

Relevance: Beginning with the Linde complaint, plaintiffs have all alleged that through this account "Arab Bank knowingly provides banking services to HAMAS" and that "Arab Bank affirmatively assists in distributing funds to support the terror campaign." Linde Complaint ¶ 345. The defendant proffered a sworn declaration by its Chief Banking Officer, Shukry Bishara, dated November 11, 2004. Paragraphs 41-43 state that the account has allegedly been "dormant for the past three years". Mr. Bishara further stated that: "Upon confirming that this account was at some time available on a website alleged to belong to HAMAS ... the Bank closed this account, froze the balance of its funds and reported it to the appropriate authorities."

Scope of Request: Plaintiffs seek complete transactional records, including the date the account was opened, any documentation related to the identity of the account holder(s), including the account opening application, and the transactional history of the account, including copies of all deposits and withdrawals, copies of all and wire transfers into or out of the account, as well as all correspondence the bank has in its possession with, or from, the account holder(s) or any other correspondence the bank has received, written or otherwise generated concerning this account, particularly concerning the closure of the account, the freezing of its

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funds and the reporting on it "to the appropriate authorities."

Response to Request No. 1:

This request asks for information concerning an account that is not alleged to be related to a specific incident in which any of the more than 2000 plaintiffs claim to have been injured. This request therefore contravenes the Court's directive that plaintiffs' Phase I requests must be linked to the specific incidents: "it is an animating principle of my thinking anyway that the accounts that are going to be looked at are accounts that have some link." *See* Transcript of June 22, 2005 Hearing before Magistrate Judge Pohorelsky at 72; *see also Id.* at 64-67. Arab Bank further objects to this request on the ground that it would require production that would subject the Bank or its employees to criminal sanctions under the bank secrecy laws of the Lebanon.

Plaintiffs' Request Number 2: Jordanian Bank Account

<u>Account Holder:</u>	Hassan Hussien Hassan Houtari
<u>Account Number:</u>	600/21697-6
<u>Branch:</u>	Al-Raseifa Branch - Jordan
<u>Relevance:</u>	Mr. Houtari is the father of Said Hassan Houtari who murdered 20 people, mostly teenagers and injured 100 more in a suicide bombing attack on June 1, 2001 at the Dolphinarium dance club in Tel Aviv.
<u>Plaintiffs Killed or Injured in Attack:</u>	Liana Saakian - murdered (Almog), Jan Blum - murdered (Almog), Aleksei Lupalo - murdered (Almog), Marina Berkovsky - murdered (Almog), Ryisa Nemirovsky - murdered (Almog), Maria Taglitsev - murdered (Almog), Uri Shahar - murdered (Almog), Elena Nalimova - murdered (Almog), Yulia Nalimova - murdered (Almog), Yulia Sklianik - murdered (Almog), Jenya Dorfman - murdered (Almog), Mariana Medvedenko - murdered (Almog), Anya Kazachkov - murdered (Almog), Simona Rudin - murdered (Almog), Irina Nepomnyashchy - murdered (Almog), Ilia Gutman - murdered (Almog), Katrin Talker - murdered (Almog), Sergei Panchenko - murdered (Almog), Lior Sklianik - injured (Almog), Maria Kavosnidova - injured (Almog), Tamara Fubrickunt - injured (Almog), Margarita Sherman - injured (Almog), Polina Valis - injured (Almog), Anna Pistunov -

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injured (Almog), Ivgeni Moldavski - injured (Almog), Oksana Datlov - injured (Almog), Tanya Weiz - injured (Almog), Irina Lipkin - injured (Almog), Ziva Mevzos - injured (Almog), Alexander Plotkin - injured (Almog).

Scope of Request:

The plaintiffs request confirmation of the name on the account, any information concerning the identity of the account holder(s) including the account opening application, and any and all records relating to wire transfers or other deposits made into the account from January 1, 2001 to the date of this letter. The plaintiffs also request all correspondence between the defendant and the account holder or any other third party concerning this account from January 1, 2001 to the date of this letter.

Response to Request No. 2:

Arab Bank objects to this request on the ground that it seeks the production of information that is not relevant to a claim or defense in this litigation in that it seeks records of any and all transactions concerning the identified account, regardless of whether that account activity bears any relation to the matters at issue herein. In their complaints, certain plaintiffs allege that the family of Said Hussien Hassan Houtari was referenced on the Saudi Committee website as eligible to receive payments from the Saudi Committee. (*See, e.g., Almog Amended Complaint* at ¶228). Subject to these objections, the foregoing General Objections and the bank secrecy objection addressed below, Arab Bank will produce, to the extent they exist, documents in its possession, custody or control concerning the identity of the account holder, including the account opening application, electronic records of wire transfers or other deposits made into the account from or at the direction of the Saudi Committee between January 1, 2001 and June 27, 2005, and correspondence related to such wire transfers or other deposits. Arab Bank further objects to this request on the ground that it would require production that would subject the Bank or its employees to criminal sanctions under the bank secrecy laws of the Jordan. Arab Bank proposes that, after any disputes over the scope of this request are resolved, it work with plaintiffs' counsel to make a good faith effort to apply to Jordanian authorities for permission to

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produce relevant, responsive documents in a manner that is consistent with Jordanian law.

Request Number 3: Bank Account Located in Palestinian-Controlled Territory

Account Holder: Shuail Ahmad Al-Masri

Account Number: 579796/6

Branch: Jenin Branch

Relevance: Mr. Al-Masri is the father of Iz Al-Din Shuail Al-Masri who murdered 15 people, including young children and injured 130 more in a suicide bombing attack on August 9, 2001 at the Sbarro pizzeria in Jerusalem.

Plaintiffs Killed or Injured in Attack: The victims include Judith Greenbaum, age 31, who was murdered (Coulter), Chana Nachenberg (34), who was placed in a coma (Coulter), Howard and Dora Green -injured (Coulter), David Danzig -injured (Coulter), Clara Ben-Zaken - injured (Linde), Yocheved Shushan - murdered (Almog), Frieda Mendelsohn - murdered (Almog), Tehilla Maoz - murdered (Almog), Kerovah Shushan - injured (Almog), Orna Amit - injured (Almog), Chava Malgrud - injured (Almog), Miryam Sara Shushan - injured (Almog)

Scope of Request: The plaintiffs request confirmation of the name on the account, any information concerning the identity of the account holder(s) including the account opening application, and any and all records relating to wire transfers or other deposits made into the account from January 1, 2001 to the date of this letter. The plaintiffs also request all correspondence between the defendant and the account holder or any other third party concerning this account from January 1, 2001 to the date of this letter.

Response to Request No. 3:

Arab Bank objects to this request on the ground that it seeks the production of information that is not relevant to a claim or defense in this litigation in that it seeks records of any and all transactions concerning the identified account, regardless of whether that account activity bears any relation to the matters at issue herein. In their complaints, certain plaintiffs allege that the Al-Masri family received a payment from the Saudi Committee and a payment from the Al-Ansar charity. (See, e.g., Coulter Complaint at ¶49). Subject to these objections, the foregoing General Objections and the bank secrecy objection addressed below, Arab Bank will produce,

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to the extent they exist, documents in its possession, custody or control concerning the identity of the account holder, including the account opening application, electronic records of wire transfers or other deposits made into the account from or at the direction of the Saudi Committee or the Al-Ansar charity between January 1, 2001 and June 27, 2005, and correspondence related to such wire transfers or other deposits. Arab Bank further objects to this request on the ground that it would require production that would subject the Bank or its employees to criminal sanctions under the bank secrecy laws of the Palestinian Monetary Authority ("PMA"). Arab Bank proposes that, after any disputes over the scope of this request are resolved, it work with plaintiffs' counsel to make a good faith effort to apply to the PMA for permission to produce relevant, responsive documents in a manner that is consistent with PMA law.

Request Number 4: Bank Account Located in Palestinian-Controlled Territory

<u>Account Holder:</u>	Muhammad Ahmad Hussein al-Shouli
<u>Account Number:</u>	444228-8, including, but not limited to sub-account 600
<u>Branch:</u>	Nablus Branch
<u>Relevance:</u>	Mr. al-Shouli is the father of Mahmoud Muhammad Ahmad Abu Hanoud al-Shouli, one of the most famous and prolific of HAMAS's terrorists, credited by the organization for organizing both the Dolphinarium and Sbarro bombings. He was killed by Israeli Security Services on November 23, 2001 and remains one of the most revered 'martyrs' of HAMAS. His image appears on posters, billboards, and many other forms of 'advertising' produced by HAMAS.

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Plaintiffs Killed or
Injured in Attack:

Dolphinarium: Liana Saakian - murdered (Almog), Jan Blum - murdered (Almog), Aleksei Lupalo - murdered (Almog), Marina Berkovsky - murdered (Almog), Ryisa Nemirovsky - murdered (Almog), Maria Taglitsev - murdered (Almog), Uri Shahar - murdered (Almog), Elena Nalimova - murdered (Almog), Yulia Nalimova - murdered (Almog), Yulia Sklianik - murdered (Almog), Jenya Dorfinan - murdered (Almog), Mariana Medvedenko - murdered (Almog), Anya Kazachkov - murdered (Almog), Simona Rudin - murdered (Almog), Irina Nepomnyashchy - murdered (Almog), Ilia Gutman - murdered (Almog), Katrin Talker - murdered (Almog), Sergei Panchenko - murdered (Almog), Lior Sklianik - injured (Almog), Maria Kavosnidova - injured (Almog), Tamara Fubrickunt - injured (Almog), Margarita Sherman - injured (Almog), Polina Valis - injured (Almog), Anna Pistunov - injured (Almog), Ivgeni Moldavski - injured (Almog), Oksana Diatlov - injured (Almog), Tanya Weiz - injured (Almog), Alexander Plotkin - injured (Almog).

Sbarro: Judith Greenbaum - murdered (Coulter), Chana Nachenberg - placed in a coma (Coulter), Howard and Dora Green -injured (Coulter), David Danzig -injured (Coulter), Clara Ben-Zaken - injured (Linde), Yocheved Shushan - murdered (Almog), Frieda Mendelsohn - murdered (Almog), Tehilla Maoz - murdered (Almog), Kerovah Shusan - injured (Almog), Orna Amit - injured (Almog), Chava Malgrud - injured (Almog), Miryam Sara Shushan - injured (Almog).

Scope of Request:

The plaintiffs request confirmation of the name on the account, any information concerning the identity of the account holder(s) including the account opening application, and any and all records relating to wire transfers or other deposits made into the account from January 1, 2001 to the date of this letter. The plaintiffs also request all correspondence between the defendant and the account holder or any other third party concerning this account from January 1, 2001 to the date of this letter.

Response to Request No. 4:

Arab Bank objects to this request on the grounds that it is overly broad, unduly burdensome, and seeks documents that are not relevant to the claims or defenses of any party in that the request seeks the production of information concerning an account purported to belong to the relative of a person who was not himself an assailant in any of the specific incident in which any of the more than 2000 plaintiffs claim to have been injured. Because plaintiffs recognize that Mahmoud Muhammad Ahmad Abu Hanoud al-Shouli was not the assailant in any such

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attack, he necessarily could not have been incentivized to be an assailant in such attacks by any promise of any post-mortem payments. Moreover, the complaints do not allege any such payments. Arab Bank further objects to this request on the ground that it would require production that would subject the Bank or its employees to criminal sanctions under the PMA bank secrecy laws.

Request Number 5: Bank Account Located in Palestinian-Controlled Territory

<u>Account Holder:</u>	Wasifa Mabrouk Saleh Idris
<u>Account Numbers:</u>	9030/627878/7 including, but not limited to sub-accounts 600, 610 and 670
<u>Branch:</u>	Rammallah (Al-Bireh)
<u>Relevance:</u>	Mrs. Idris's daughter, Wafa Idris, was the first female Palestinian suicide bomber. Ms. Idris blew herself up on January 27, 2002 in downtown Jerusalem.
<u>Plaintiffs Killed or Injured in Attack:</u>	Pinhas Tokatly - murdered (Almog), Ludmila Gershikov - injured (Almog), Mark I. Sokolow, Rena M. Sokolow, Jamie A. Sokolow, Lauren M. Sokolow - injured. (Coulter).
<u>Scope of Request:</u>	The plaintiffs request confirmation of the name on the account, any information concerning the identity of the account holder(s) including the account opening application, and any and all records relating to wire transfers or other deposits made into the account from December 1, 2001 to the date of this letter. The plaintiffs also request all correspondence between the defendant and the account holder or any other third party concerning this account from December 1, 2001 to the date of this letter.

Response to Request No. 5:

Arab Bank objects to this request on the ground that it seeks the production of information that is not relevant to a claim or defense in this litigation in that it seeks records of any and all transactions concerning the identified account, regardless of whether that account activity bears any relation to the matters at issue herein. In their complaints, certain plaintiffs allege that the

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family of Wafa Idris was referenced on the Saudi Committee website as eligible to receive a payment from the Saudi Committee. (*See, e.g., Almog Amended Complaint at ¶228*). Subject to these objections, the foregoing General Objections and the bank secrecy objection addressed below, Arab Bank will produce, to the extent they exist, documents in its possession, custody or control concerning the identity of the account holder, including the account opening application, electronic records of wire transfers or other deposits made into the account from or at the direction of the Saudi Committee between January 1, 2001 and June 27, 2005, and correspondence related to such wire transfers or other deposits. Arab Bank further objects to this request on the ground that it would require production that would subject the Bank or its employees to criminal sanctions under the bank secrecy laws of the PMA. Arab Bank proposes that, after any disputes over the scope of this request are resolved, it work with plaintiffs' counsel to make a good faith effort to apply to the PMA for permission to produce relevant, responsive documents in a manner that is consistent with PMA law.

Request Number 6: Bank Account Located in Palestinian-Controlled Territory

<u>Account Holder:</u>	Hussien Mohammad Farah Tawil
<u>Account Number:</u>	626831/5 including but not limited to sub-accounts 670 and 610
<u>Branch:</u>	Rammallah (Al-Bireh)
<u>Relevance:</u>	Mr. Tawil is the father of Dia Tawil who blew up a bus stop in the French Hill section of Jerusalem on March 27, 2001 injuring 21 civilians.
<u>Plaintiffs Killed or Injured in Attack:</u>	Danielle Fine-Cohen - injured (Almog), Shmuel Shfaim - injured (Almog)
<u>Scope of Request:</u>	The plaintiffs request confirmation of the name on the account, any information concerning the identity of the account holder(s) including the account opening application, and any and all records relating to wire transfers or other deposits made into the account from January 1, 2001 to the date of this letter. The plaintiffs also request all correspondence

between the defendant and the account holder or any other third party concerning this account from January 1, 2001 to the date of this letter.

Response to Request No. 6:

Arab Bank objects to this request on the ground that it seeks the production of information that is not relevant to a claim or defense in this litigation in that it seeks records of any and all transactions concerning the identified account, regardless of whether that account activity bears any relation to the matters at issue herein. In their complaints, certain plaintiffs allege that the family of Dia Tawil received a payment from the Saudi Committee. (*See, e.g., Almog Amended Complaint at ¶¶209*). Subject to these objections, the foregoing General Objections and the bank secrecy objection addressed below, Arab Bank will produce, to the extent they exist, documents in its possession, custody or control concerning the identity of the account holder, including the account opening application, electronic records of wire transfers or other deposits made into the account from or at the direction of the Saudi Committee between January 1, 2001 and June 27, 2005, and correspondence related to such wire transfers or other deposits. Arab Bank further objects to this request on the ground that it would require production that would subject the Bank or its employees to criminal sanctions under the bank secrecy laws of the PMA. Arab Bank proposes that, after any disputes over the scope of this request are resolved, it work with plaintiffs' counsel to make a good faith effort to apply to the PMA for permission to produce relevant, responsive documents in a manner that is consistent with PMA law.

Request Number 7: Bank Account Located in Palestinian-Controlled Territory

Account Holder: Muhyi al-Din Kamil Salah Hubayshah
Account Number: 444136/2 including but not limited to sub-accounts 500, 510, and 570
Branch: Nablus
Relevance: Mr. Al-Din Kamil's son, Maher Muhyi al-Din Kamil, was a suicide

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bomber responsible for the murder of 15 commuters on the No. 16 bus in Haifa on December 2, 2001.

Plaintiffs Killed or Injured in Attack:

Michael Zarayski - murdered (Almog), Rassime Safiullin - murdered (Almog), Riki Hadad - murdered (Almog), Inna Frenkel - murdered (Almog), Yitzak Ringal - murdered (Almog), Ronen Kachlon - murdered (Almog), Mara Fishman - murdered (Almog), Zizilia Kuzmin - murdered (Almog), Tatiana Borovik - murdered (Almog), Shimon Kabesa - injured (Almog), Ronen Avrahami - injured (Almog).

Scope of Request:

The plaintiffs request confirmation of the name on the account, any information concerning the identity of the account holder(s) including the account opening application, and any and all records relating to wire transfers or other deposits made into the account from June 1, 2001 to the date of this letter. The plaintiffs also request all correspondence between the defendant and the account holder or any other third party concerning this account from June 1, 2001 to the date of this letter.

Response to Request No. 7:

Arab Bank objects to this request on the ground that it seeks the production of information that is not relevant to a claim or defense in this litigation in that it seeks records of any and all transactions concerning the identified account, regardless of whether that account activity bears any relation to the matters at issue herein. In their complaints, certain plaintiffs allege that the family of Maher Muhyi al-Din Kamil was referenced on the Saudi Committee website as eligible to receive a payment from the Saudi Committee. (*See, e.g., Almog Amended Complaint at ¶228*). Subject to these objections, the foregoing General Objections and the bank secrecy objection addressed below, Arab Bank will produce, to the extent they exist, documents in its possession, custody or control concerning the identity of the account holder, including the account opening application, electronic records of wire transfers or other deposits made into the account from or at the direction of the Saudi Committee between January 1, 2001 and June 27, 2005, and correspondence related to such wire transfers or other deposits. Arab Bank further objects to this request on the ground that it would require production that would subject the

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Bank or its employees to criminal sanctions under the bank secrecy laws of the PMA. Arab Bank proposes that, after any disputes over the scope of this request are resolved, it work with plaintiffs' counsel to make a good faith effort to apply to the PMA for permission to produce relevant, responsive documents in a manner that is consistent with PMA law.

Request Number 8: Bank Account Located in Palestinian-Controlled Territory

<u>Account Holder:</u>	Muhammad Jamil Mutlaq Ghanim (a/ka/a Ghanem)
<u>Account Number:</u>	521586-2
<u>Branch:</u>	Tulkarem
<u>Relevance:</u>	Mr. Ghanim's son, Rami Muhammad Jamil Mulaq Ghanim, blew up the London Cafe in Netanya on March 30, 2003, injuring four people.
<u>Plaintiffs Killed or Injured in Attack:</u>	Lidia Samouel - injured (Almog), Joseph Samouel - injured (Almog), Shlomo Menashe - injured (Almog), Lili David - injured (Almog).
<u>Scope of Request:</u>	The plaintiffs request confirmation of the name on the account, any information concerning the identity of the account holder(s) including the account opening application, and any and all records relating to wire transfers or other deposits made into the account from January 1, 2003 to the date of this letter. The plaintiffs also request all correspondence between the defendant and the account holder or any other third party concerning this account from January 1, 2003 to the date of this letter.

Response to Request No. 8:

Arab Bank objects to this request on the ground that it seeks the production of information that is not relevant to a claim or defense in this litigation in that it seeks records of any and all transactions concerning the identified account, regardless of whether that account activity bears any relation to the matters at issue herein. In their complaints, plaintiffs do not make any allegations of payments to the family of Rami Muhammad Jamil Mulaq Ghanim, but generally allege that various suicide bombers were incentivized to engage in certain attacks by payments made by the Saudi Committee. Subject to these objections, the foregoing General Objections

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and the bank secrecy objection addressed below, Arab Bank will produce, to the extent they exist, documents in its possession, custody or control concerning the identity of the account holder, including the account opening application, electronic records of wire transfers or other deposits made into the account from or at the direction of the Saudi Committee between January 1, 2001 and June 27, 2005, and correspondence related to such wire transfers or other deposits. Arab Bank further objects to this request on the ground that it would require production that would subject the Bank or its employees to criminal sanctions under the bank secrecy laws of the PMA. Arab Bank proposes that, after any disputes over the scope of this request are resolved, it work with plaintiffs' counsel to make a good faith effort to apply to the PMA for permission to produce relevant, responsive documents in a manner that is consistent with PMA law.

Request Number 9: Bank Account Located in Palestinian-Controlled Territory

<u>Account Holder:</u>	First Name Unknown (Aliyan)
<u>Account Number:</u>	519610/8
<u>Branch:</u>	Tulkarem
<u>Relevance:</u>	The son of the account holder, Ahmad Omar Aliyan, blew himself up in a shopping mall in Netanya on March 4, 2001, killing 3 people and wounding 65 others.
<u>Plaintiffs Killed or Injured in Attack:</u>	Bosmat Glam - injured (Almog), Ariel Mahfud - injured (Almog), Mazal Alevi - injured (Almog).
<u>Scope of Request:</u>	The plaintiffs request confirmation of the name on the account, any information concerning the identity of the account holder(s) including the account opening application, and any and all records relating to wire transfers or other deposits made into the account from January 1, 2001 to the date of this letter. The plaintiffs also request all correspondence between the defendant and the account holder or any other third party concerning this account from January 1, 2001 to the date of this letter.

Response to Request No. 9:

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Arab Bank objects to this request on the ground that it seeks the production of information that is not relevant to a claim or defense in this litigation in that it seeks records of any and all transactions concerning the identified account, regardless of whether that account activity bears any relation to the matters at issue herein. In their complaints, certain plaintiffs allege that the family of Ahmad Omar Aliyan was referenced on the Saudi Committee website as having received a payment from the Saudi Committee. (*See, e.g., Almog Amended Complaint at ¶237*). Subject to these objections, the foregoing General Objections and the bank secrecy objection addressed below, Arab Bank will produce, to the extent they exist, documents in its possession, custody or control concerning the identity of the account holder, including the account opening application, electronic records of wire transfers or other deposits made into the account from or at the direction of the Saudi Committee between January 1, 2001 and June 27, 2005, and correspondence related to such wire transfers or other deposits. Arab Bank further objects to this request on the ground that it would require production that would subject the Bank or its employees to criminal sanctions under the bank secrecy laws of the PMA. Arab Bank proposes that, after any disputes over the scope of this request are resolved, it work with plaintiffs' counsel to make a good faith effort to apply to the PMA for permission to produce relevant, responsive documents in a manner that is consistent with PMA law.

Request Number 10: Bank Account Located in Palestinian-Controlled Territory

<u>Account Holder:</u>	Kamil Sa'id Abdallah al-Zubeidi
<u>Account Number:</u>	414648/4 including but not limited to sub-accounts 570 and 500
<u>Branch:</u>	Nablus
<u>Relevance:</u>	Mr. al-Zubeidi's son, Imad Kamil Sa'id al-Zubeidi, blew himself up in Kfar Saba on April 22, 2001, killing one person and wounding 38 others.

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Plaintiffs Killed or
Injured in Attack:

Dr. Mario Goldin was murdered (Ahnog), Michael Milman was injured (Almog).

Scope of Request:

The plaintiffs request confirmation of the name on the account, any information concerning the identity of the account holder(s) including the account opening application, and any and all records relating to wire transfers or other deposits made into the account from January 1, 2001 to the date of this letter. The plaintiffs also request all correspondence between the defendant and the account holder or any other third party concerning this account from January 1, 2001 to the date of this letter.

Response to Request No. 10:

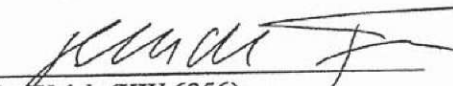
Arab Bank objects to this request on the ground that it seeks the production of information that is not relevant to a claim or defense in this litigation in that it seeks records of any and all transactions concerning the identified account, regardless of whether that account activity bears any relation to the matters at issue herein. In their complaints, plaintiffs do not make any allegations of payments to the family of 'Imad Kamil Sa'id al-Zubeidi, but generally allege that various suicide bombers were incentivized to engage in certain attacks by payments made by the Saudi Committee. Subject to these objections, the foregoing General Objections and the bank secrecy objection addressed below, Arab Bank will produce, to the extent they exist, documents in its possession, custody or control concerning the identity of the account holder, including the account opening application, electronic records of wire transfers or other deposits made into the account from or at the direction of the Saudi Committee between January 1, 2001 and June 27, 2005, and correspondence related to such wire transfers or other deposits. Arab Bank further objects to this request on the ground that it would require production that would subject the Bank or its employees to criminal sanctions under the bank secrecy laws of the PMA. Arab Bank proposes that, after any disputes over the scope of this request are resolved, it work with plaintiffs' counsel to make a good faith effort to apply to the PMA for permission to

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produce relevant, responsive documents in a manner that is consistent with PMA law.

Dated: July 7, 2005

LeBoeuf, Lamb, Greene & MacRae LLP
125 West 55th Street
New York, New York 10019

By: 
Kevin Walsh (KW 6256)
kwalsh@llgm.com
Randall M. Fox (RF 2845)
rmfox@llgm.com
Tel: 212-424-8000
Fax: 212-424-8500

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CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing Responses and Objections of Defendant Arab Bank plc to Plaintiffs' Joint Modified Phase I Request for the Production of Documents to Defendant Arab Bank plc to be served upon the plaintiffs by causing them to be sent, this 7th day of July 2005 to:

BY ELECTRONIC DELIVERY:

IN LITTLE, ET AL. V. ARAB BANK, PLC, CV 04-5449

Liaison Counsel for Little Plaintiffs:
Lee S. Shalov, Esq. (lshalov@lawssb.com)
SHALOV, STONE & BONNER LLP
485 Seventh Avenue
Suite 1000
New York, N.Y. 10018
Telephone: (212) 239-4340
Facsimile: (212) 239-4310

Co-Counsel for Little Plaintiffs:
Mark S. Werbner, Esq. (mwerbner@swtriallaw.com)
SAYLES WERBNER
4400 Renaissance Tower
1201 Elm Street
Dallas, TX 75270
Telephone: (214) 939-8711
Facsimile: (214) 939-8787

Richard D. Heideman, Esq. (rheideman@HLNKlaw.com)
HEIDEMAN LEZELL NUDELMAN & KALIK, P.C.
1146 19th Street, NW
Fifth Floor
Washington, D.C. 20036
Telephone: (202) 462-8990
Facsimile: (202) 462-8995

Steven R. Perles, Esq. (sperles@perleslaw.com)
PERLES LAW FIRM, P.C.
1615 New Hampshire Avenue
Suite 200
Washington, D.C. 20009
Telephone: (202) 745-1300
Facsimile: (202) 745-1858

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IN LINDE, ET AL. v. ARAB BANK, PLC, CV 04-2799 & COULTER, ET AL. v. ARAB BANK, PLC,
CV 05-365

Liaison Counsel for Linde Plaintiffs; Co-counsel for the Coulter Plaintiffs:

Andrew D. Friedman, Esq. (afriedman@whesq.com)
Joshua D. Glatter, Esq. (jglatter@whesq.com)
WECHSLER HARWOOD LLP
488 Madison Avenue
8th Floor
New York, NY 10022
Telephone: (212) 935-7400
Facsimile: (212) 753-3630

Counsel for the Coulter Plaintiffs; Co-Counsel for Linde Plaintiffs:

Gary M. Osen, Esq. (gmo@osen.us)
OSEN & ASSOCIATES, LLC
700 Kindermack Road
Oradell, NJ 07649
Telephone: (201) 265-6400
Facsimile: (201) 265-0303

Robert A. Swift, Esq. (rswift@koh Swift.com)
Steven M. Steingard, Esq. (ssteingard@koh Swift.com)
KOHN SWIFT & GRAF, P.C.
One South Broad Street
Suite 2100
Philadelphia, PA 19107
Telephone: (215) 238-1700
Facsimile: (215) 238-1968

IN ALMOG, ET AL. v. ARAB BANK, PLC, CV 04-5564 & AFRIAT-KURTZER, ET AL. v. ARAB
BANK, PLC, CV 05-388

Counsel for Almog & Afriat-Kurtzer Plaintiffs

Ronald L. Motley, Esq. (rmotley@motleyrice.com)
Jodi W. Flowers, Esq. (jflowers@motleyrice.com)
John M. Eubanks, Esq. (jeubanks@motleyrice.com)
MOTLEY RICE LLC
28 Bridgeside Boulevard
P.O. Box 1792
Mt. Pleasant, SC 29465
Telephone: (843) 216-9000
Facsimile: (843) 216-9450

Co-Counsel for Almog Plaintiffs

Alan Gerson, Esq. (gerson@gilgintl.org)
ATTORNEY AT LAW
2131 S. Street
Washington, D.C. 20008
Telephone: (202) 966-8557



JA1964